

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matters of)	
)	
Investigation of Tariffs Filed by ACS of)	CC Docket No. 02-36
Anchorage, Inc., and the National Exchange)	
Carrier Association)	
)	
December 17, 2001 MAG Access Charge)	CCB/CPD No. 01-23
Tariff Filings)	
)	

ACS of Anchorage, Inc. Request for an Extension of Time to Submit Direct Case

On February 15, 2002, in its Order Designating Issues for Investigation (the “*Designation Order*”), the Commission ordered ACS of Anchorage, Inc. (“ACS”) to submit its direct case in the above-captioned tariff investigation proceeding by March 7, 2002.¹ ACS hereby requests that the Commission extend this deadline until March 29, 2002.

While ACS is mindful of the five-month statutory deadline for Commission action in this docket,² it would be virtually impossible for ACS to assemble a complete, detailed, and accurate response to the issues the Commission raised in the *Designation Order* by March 7. In the *Designation Order*, the Commission raises four issues of extraordinary complexity that require a detailed analysis of ACS’s interstate access rates and revenue requirements. ACS has only a limited number of employees with the expertise to compile the data the Commission requests. All of these employees are currently fully committed to responding to a comprehensive review of ACS’s intrastate rates being conducted by the Regulatory Commission of Alaska (“RCA”). As such, ACS believes that the additional time will vastly improve the quality of its responses to the Commission’s questions.

¹ *Investigation of Tariffs Filed by ACS of Anchorage, Inc., and the National Exchange Carrier Ass’n*, CC Docket No. 02-36, Order Designating Issues for Investigation, DA 02-371 (Com. Car. Bur., Comp. Pric. Div. rel. Feb 15, 2002).

The RCA has scheduled a two-week hearing on the intrastate local exchange and exchange access rates charged by ACS and its local exchange carrier affiliates that will run from March 4 through March 15 in Anchorage, Alaska. At this hearing, the Commission will examine evidence regarding the local and intrastate access costs and rates of ACS and its ILEC affiliates, leading to potentially the first adjustment in ACS's local exchange rates since 1992.³ At the time it approved ACS's purchase of the local exchange operations of the Municipality of Anchorage, the Alaska Public Utility Commission directed ACS to file "revenue requirement, cost-of-service, and rate design studies" by July 2, 2001.⁴ On March 27, 2001, the RCA opened a docket to initiate this investigation.⁵

The March 4-15 hearings, therefore, culminate almost a full year of effort on the part of ACS personnel, Commission staff, and intervenor General Communication, Inc. ("GCI") to conduct discovery, prepare testimony, and assemble, review, and evaluate extensive cost and revenue data for ACS and all of its ILEC-affiliates.

² 47 U.S.C. § 204(a)(2)(A).

³ *Filing by the Municipality of Anchorage d/b/a/ Anchorage Telephone Utility for a Local Service Rate Increase Pursuant to 3 AAC 53.110-.130*, Local Service Rate Increase Based on Jurisdictional Cost Allocation Factor Adjustments, Docket No. U-92-99 (Nov. 18, 1992).

⁴ *Application filed by Alaska Communications Systems, Inc., for Authority to Acquire a Controlling Interest in the Municipality of Anchorage d/b/a/ Anchorage Telephone Utility a/k/a ATU Telecommunications, Holder of Certificates of Public Convenience and Necessity Nos. 120 and 513 Authorizing the Provision of Telecommunications Public Utility and Public Pay Telephone Service*, Docket No. U-98-173, Order Holding Procedural Matters in Abeyance, Affirming Oral Cancellation of the Hearing, Accepting Stipulation, and Approving Applications, Subject to Conditions, Order No. 7 (Apr. 9, 1999), at 8. The RCA is the successor to the Alaska Public Utility Commission.

⁵ *ACS of Anchorage, Inc., d/b/a/ Alaska Communications Systems, ACS Local Service, & ACS, Revenue-Requirement, Cost-of-Service, and Rate Design Study Filings Required Pursuant to U-98-173(7), and the Depreciation Study Filing Required Pursuant to U-96-78(1)*, U-01-34, Order Opening Docket of Investigation to Receive Filings, Order No. 1 (Mar. 27, 2001).

After the conclusion of that hearing, ACS will be able to dedicate all personnel and resources necessary to assemble a careful, complete, and accurate direct case in this proceeding within two weeks. ACS continues to believe that its MAG tariff filing complied with all relevant Commission rules, and is eager to build its case supporting that position. It cannot do so, however, within the time allotted by the Commission.

For the foregoing reasons, therefore, ACS requests that the Commission grant an extension of time in this proceeding to permit it to file its direct case by March 29, 2002.

Respectfully submitted,

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Certificate of Service

I, Richard R. Cameron, hereby certify that a copy of the foregoing ACS of Anchorage, Inc., Request for an Extension of Time to Submit Direct Case, was served, via first-class, United States mail, postage prepaid, on the following interested persons:

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